

Exhibit D

Nicole Santucci

From: adrienne woodslawpc.com <adrienne@woodslawpc.com>
Sent: Monday, January 23, 2023 5:47 PM
To: Jeannette Litos
Cc: Nicole Santucci; Alexis Dreher; Yann Geron
Subject: In re Madhu Grover, Chapter 7 Case No. 22-11730 (MG)

 [WayfairCreditCardStatements 1.zip](#)

 [TDAmeritradeStatements 1.zip](#)

 [ChaseBankStatements2022 1.zip](#)

 [ChaseBankStatements2021 1.zip](#)

 [CancelledChecksASMG 1.zip](#)

 [ASMGDocuments 1.zip](#)

 [ASMGBankStatements 1.zip](#)

 [AmexCreditCardStatements 1.zip](#)

 [Jewelry Photo.jpeg](#)

 [Clothes Photo 4.jpeg](#)

 [Clothes Photo 3.jpeg](#)

 [Clothes Photo 2.jpeg](#)

 [Clothes Photo 1.jpeg](#)

 [Chase Credit Card Photo 2.jpeg](#)

 [Chase Credit Card Photo 1.jpeg](#)

 [Infosys Contract.pdf](#)

 [ChaseCardStatements2021.pdf](#)

 [ChaseCardsStatements 2022.pdf](#)

 [Engagement Contract CraftyApes.pdf](#)



[StorageContract.pdf](#)

Hi Jeannette,

please see below, and attached, in response to Yann's email of Friday.

1. A list of all names used by the Debtor including AKAs and DBAs;

Ms. Grover uses no other names and has no D/B/A's.

2. Bank statements and canceled checks for all accounts in the Debtor's name (individually or jointly) for the two-year period prior to the petition date;

Please see attached.

3. Bank statements and relevant documents regarding the JPMorgan Chase Bank account reflected in the Statement of Financial Affairs, Question 23, evidencing that the account belongs to ASMG Consulting, Inc. or Ashna Shah;

Please see attached.

By way of explanation as to ownership of the funds in the JPMorgan Chase Bank account:

1. The funds in the account were deposited for ASMG Consulting LLC ("ASMG"). Ms. Grover is a 50% member of ASMG (see attached formation documents). This change occurred in January 2022, when the members at that time (Ms. Madhu Grover, Mrs. Vijaya Grover and Ashna Shah) agreed that going forward Mrs. Vijaya Grover (Ms. Grover's mother, Ms. Shah's grandmother) would relinquish her 20% shares half each to Ms. Grover and Ms. Shah.

In or around January 2022, ASMG had issues logging into its Bank of America account. Ms. Grover and Ms. Shah have since been using their joint account to receive payments on behalf of ASMG as well as to make payments on behalf of ASMG to consultants who work for the entity. Specifically, the deposits made in 2022 by Crafty Apes LLC ("Crafty Apes") and Infosys Limited ("Infosys") were made for the

benefit of ASMG. See attached contracts. Ms. Grover now understands that this is not an ideal way of receiving and holding funds for the business, but was unaware that this commingling of personal and ASMG funds was an issue at the time.

2. Assuming that the commingling of funds into the JPMorgan Chase Bank account eliminated ASMG's right to ownership of the funds, the funds are equal property of Ms. Grover and her daughter, Ms. Shah. Ms. Grover and Ms. Shah are joint owners of the JPMorgan Chase Bank account (see statements) and have been since 2016. Under New York Banking Law, each account holder holds an immediate and unconditional one-half interest in the deposited funds. NYBL s. 675(a).

4. Statements for all securities and/or retirement accounts in the Debtor's name (individually or jointly) for the two-year period prior to the petition date, including but not limited to the Debtor's TD Ameritrade account(s);

Ms. Grover has no securities or retirement accounts other than the aforementioned TD Ameritrade account, which was opened in May 2021 and closed in October 2022 (statements attached). As established by the account statements, the balance was consistently \$50 - the minimum required to keep the account open so that Ms. Grover had access to certain tools offered to TD's clients, which she accessed for use in her work at ASMG.

5. Credit card statements for all accounts in the Debtor's name (individually or jointly) for the two-year period prior to the petition date;

Ms. Grover had five (5) credit cards, all now closed:

- Wayfair Credit - Statements attached.
- JP Morgan 3 cards - Account ending in 5895 is a joint card with Ashna Shah (see attached image of companion card that was held by Ms. Shah). All statements attached.
- American Express - Statements Attached (note that AMEX only provides statements for eighteen months; however, the year end

statements annexed hereto shows all charges for the relevant years.

6. Images, inventory lists, estimated values, and appraisals (if any) for all of (a) the Debtor's paintings/art reflected on Schedule A/B, Question 8, including titles of the artwork and names of the corresponding artists, and (b) all artwork including but not limited to paintings, prints, and sculptures stored at Moishe's Moving System storage facility in Bronx, NY;

There are no images or appraisals, but Ms. Grover will provide access to the storage facility should the trustee or his representative wish to view its contents.

There are no titles or corresponding artists. The art consists of family photographs of Ms. Grover and her daughter and paintings by Ms. Grover and her daughter in collaboration with Ken Kan, an artist/painting teacher with 168 Gallery in Hong Kong. Ms. Grover hired Mr. Kan to instruct them in copying works by famous Asian artists.

7. Images, inventory lists, estimated values, and appraisals (if any) for all designer clothing and jewelry listed in response to Schedule A/B, questions 11 and 12;

Ms. Grover does not own designer clothes or expensive jewelry. As can be seen from her credit card statements, Ms. Grover shops primarily at Intermix and similar stores that sell nice clothes, but not high-end couture. Photographs of samples of her clothes and jewelry are attached.

8. All documents reflecting the Debtor's interest in ASMG Consulting, Inc. including but not limited to the certificate of incorporation, articles of association, bylaws, etc.;

See attached:

- Articles of Organization
- Operating Agreement
- Statement of Organizer

9. Bank statements and canceled checks for all accounts in ASMG Consulting Inc.'s name for the two-year period prior to the petition date;

ASMG's statements for its Bank of America account are attached.

10. Proof of income listed in response to Schedule I, Question 8(a);

Ms. Grover's income derives from draws from ASMG and, for a period of time, Ms. Grover received unemployment insurance that was deposited directly into her bank account.

Ms. Grover is in the process of obtaining copies of her 1099 for 2022 and will provide same as soon as possible (these are due January 31, 2023, but she has contacted her accountant to obtain copies asap).

11. All documents reflecting any interest/dividends the Debtor received in the two-year period prior to the filing date including amount(s) received and source of funds; and

Ms. Grover has no investments and, as such, has received no dividends or interest in the past two (2) years.

12. Written description of Ashna Shah and Manish Shah's relationship to the Debtor and the events surrounding the Debtor's transfer of her ownership in ASMG Consulting, Inc. to Ashna Shah.

Manish Shah is the Debtor's husband, from whom she is legally separated. Although they have been legally separated since 2005, Mr. Shah and Ms. Grover are on good terms and she currently resides with him as a roommate, contributing what she can toward living expenses. Ashna Shah is Ms. Grover's adult daughter with Mr. Shah. Both work for ASMG. In January 2022, Mrs. V. Grover relinquished her membership interests in ASMG to her daughter and granddaughter, each of whom now own half of ASMG.

Please let us know if you have any additional questions or if anything herein requires clarification.

Best regards,

Adrienne

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